III. Remarks

Reconsideration and allowance of the subject application are respectfully requested.

Claims 7-10 and 15-37 are pending in the application. Claims 7, 15, 24, and 31 are independent.

Claims 15, 24, and 31 were rejected under 35 USC 112, second paragraph, for the reasons noted at page 2 of the Office Action. Applicant respectfully traverses this rejection on the ground that the person of ordinary skill in the art would not be confused as to the meaning or scope of the claims.

Nevertheless, these claims have been amended for clarity with respect to the specification and Drawings, and not in response to any statutory requirement.

Claims 15-37 were rejected as being unpatentable over <u>Woynoski</u>, <u>Muehlberger</u>, and <u>Fougnies</u>, for the reasons noted at pages 3-6 of the Office Action. Applicant respectfully traverses all art rejections.

Each of the independent claims recites a novel combination of steps whereby a conventional ATM or POS terminal may be used to provide a prepaid telephone calling card. The calling card PIN is printed out or provided to the user without the ATM or POS contacting the telephone service provider.

Notably, a second PIN is provided *during* the transaction, where the plurality of second PIN numbers is grouped into a plurality of groups of second PIN numbers, each group of second PIN numbers corresponding to a different quantity of time to be purchased.

In contrast, none of the cited art discloses or suggests (when taken individually or in combination) the claimed combination of features whereby the second PIN is provided during the transaction, and wherein the plurality of second PIN numbers is grouped into a plurality of groups of second PIN numbers, each group of second PIN numbers corresponding to a different quantity of time to be purchased. Accordingly, the salient claimed features of the present invention are nowhere disclosed or suggested by the cited art.

The remaining cited art is to similar effect and similarly fails to disclose or suggest the unique combination of features discussed above.

In view of the above amendments and remarks, it is believed that this application is now in condition for allowance, and a Notice thereof is respectfully requested.

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Applicants' undersigned attorney may be reached by telephone at (202) 625-3507. All correspondence should continue to be directed to the address given below.

Respectfully submitted,

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